IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOSE ANDRES CAZARES, as Special Administrator of the Estate of ANDREW CAZARES, deceased,	)	
Plaintiff,	)	No.: 13-cv-05626
v.	)	Honorable Judge Kendall
JOSEPH FRUGOLI, JOHN R. MORAN, PRIMERO, INC., an Illinois Corporation, METROPOLITAN BANK LAND TRUST 1463, and CITY OF CHICAGO, a municipal corporation,	)	
Defendants.	)	

FAUSTO T. MANZERA, as Special Administrator of the Estate of FAUSTO A. MANZERA, deceased, and MARIA VALEZ, as Co-Special Administrator of the Estate of FAUSTO A. MANZERA, deceased.	)	
Plaintiff,	)	No.: 13-cv-05626
v.	)	Honorable Judge Kendall
JOSEPH FRUGOLI, JOHN R. MORAN, PRIMERO, INC., an Illinois Corporation, METROPOLITAN BANK LAND TRUST 1463, and CITY OF CHICAGO, a municipal corporation,	)	
Defendants.	)	

UNOPPOSED MOTION FOR SUBSTITUTION OF EXPERT

Now Comes the Plaintiffs, Fausto Manzera and Cazares, by their attorneys, Cooney & Conway and Timothy Cavanagh and Associates, and move this Honorable Court for leave to substitute Geoffrey P. Alpert, Ph.D., and state:

1. Dr. Geoffrey P. Alpert is expected to testify to the statistical likelihood that the Chicago Police have a Code of Silence with regard to DUI charges against police officers, and other matters.

2. Dr. Palmer Morrel-Samuels, Ph.D., who was previously named by the plaintiffs, as a potential expert, is withdrawn as an expert for the plaintiffs.

3. It is anticipated that Dr. Alpert's report will be tendered to defense counsel on the same day that Dr. Morrel-Samuels' report was to be tendered.

4. No delay will be occasioned by this substitution.

5. Plaintiffs have contacted Defense Counsel and Defense Counsel have no objections.

Respectfully Submitted,

James T. Newman

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